

Expereo USA

11921 Freedom Dr., Suite 550, Reston, VA 20190 United States

Reston, Feburary 28th, 2011

Subject: CPNI Certification EB 06-36

Dear Sir/Madame,

On behalf of Expereo USA, INC., please find enclosed the company's annual CPNI certification for filing in the above-referenced docket. Please contact me at +1 571 449 8490 if you have any questions regarding this filing.

Respectfully submitted,

Alphons Mulder

CEO

Annual 47 C.F.R. § 64.2009(e) CPNI Certification EB Docket No. 06-36

Annual CPNI Certification for 2011 covering the calendar year 2010.

- 1. Date filed: March 1, 2011
- 2. Name of company(s) covered by this certification: Expereo USA, Inc.
- 3. Form 499 Filer ID: 828596
- 4. Name of signatory: Alphons Mulders
- 5. Title of signatory: Managing Director & CEO
- 6. Certification:
- I, Alphons Mulders, certify that I am an officer of Expereo USA, Inc. (the "Company"), and acting as an agent of the company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements set forth in Sections 64.2001 *et seq.* of the Commission's rules.

The Company did not take any actions (*i.e.*, proceedings instituted or petitions filed at state commissions, the court system, or at the Commission) against data brokers in 2010.

The Company did not receive customer complaints in 2010 concerning the unauthorized release of CPNI.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed

Attachment

STATEMENT OF COMPLIANCE WITH CPNI RULES

Expereo USA, Inc. (the "Company") provides exclusively carrier-to-carrier data only telecommunications services (for the avoidance of doubt Expereo does not provide any voice services) and has no consumer or small business customers. Its customers are carriers and systems integrators and other enhanced service providers. Consequently, the Company does not have a "subscriber" relationship with its end-user customers and does not send "bills" to end-user customers. The Company does not offer or market its services to the public or to such classes of users as to be effectively available directly to the public. The Company provides service only to other carriers and enhanced services providers, and typically does not obtain information that relates to the quantity, technical configuration, type, or location of services other than those with which the services it provides are connected.

The Company has implemented processes and procedures as to when its employees are and are not permitted to use CPNI. All Company employees are required to abide by the Company's CPNI Manual. The Company's CPNI Manual requires employees to maintain the confidentiality of all information, including CPNI, obtained as result of their employment by the Company. The Company's CPNI Manual also explains how Company employees are required to use, maintain and disclose CPNI. Employees who violate the Company's CPNI Manual are subject to disciplinary action, including possible termination.

Consistent with the CPNI rules, the Company may use, disclose and permit access to CPNI without customer approval (1) to render, bill and collect for services provided (2) to protect rights or property of the Company, other users, or other carriers from unlawful use; and (3) for the purpose of network maintenance, repair and troubleshooting.

The Company does not use, disclose, or permit access to CPNI for marketing purposes other than for the purpose of providing service offerings for the type of services to which the Company's customer already subscribes, except pursuant to the written consent of its customers pursuant to 47 C.F.R. § 64.2010(g). The Company is therefore not required to seek other approval from existing customers to use their CPNI and does not maintain a separate record of a customer's approval to use CPNI. In the event the Company changes its marketing practices or expands its service offerings so that other customer approval is required, the Company will implement a system by which customers will be notified of such use and the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

The Company does not share, sell, lease or otherwise provide CPNI to any of its affiliates, suppliers, vendors or any other third parties for the purposes of marketing any services except pursuant to customer consent.

To the extent the Company engages in any market campaigns, it has established a supervisory review process to ensure that such campaigns are consistent with the Commission's rules.

The Company maintains a record for at least one year of its own and, if applicable, affiliates' sales and marketing campaigns, if any, that use customers' CPNI.

In the event that the Company changes its marketing practices such that opt-out notices are required, the Company will implement procedures whereby it will provide the Commission written notice within five (5) business days of any instance where the opt-out mechanisms do not work properly, to such a degree that customers' inability to opt-out is more than an anomaly.

The Company did not receive any customer complaints in 2010 concerning the unauthorized release of or access to CPNI. The Company has processes and procedures in place to maintain records of any security breaches and to notify law enforcement and customers of such breaches, consistent with the Commission's rules.